



Good afternoon. My name is Debbie Nece. I am with Cargill Incorporated. We would like to thank AMS for allowing us the opportunity to speak on possible ruling for the use of “natural” in relationship to the raising of livestock. As we have considered our thoughts on this topic, we believe that a favorable outcome of this discussion would be policy and labeling that would insure the following:

- 1) Creation of product claims that are meaningful to the consumer
- 2) Creation of product claims that minimize confusion in the eyes of the consumer
- 3) Development of guidelines that enable the animal production supply chain to successfully deliver on the promises made to the consumer.

We feel that there is much confusion in the foodservice and retail market place on what “natural”, means and that many feel mis-lead due to this confusion. “Natural” has become a “buzz word” in the marketing of food items and without a set of regulations to enforce what are the standards, we have ended up with various uses of what “natural” means.

Cargill raises, purchases, harvests, and processes livestock that are raised under various types of programs. Some of these include the restrictions of the use of antibiotics and hormones as well as certain feed sources and controls. It is critical that we can offer the consumer a variety of programs. However, it is also critical that each major type of program, or “tier” of products, have minimum standards that must be met and assured in order to bear the legend of each tier.

The first tier is that of Organic. The minimum standards have already been set forth-in regulation on this and a seal established to convey that a particular product has met these standards. Organic covers deep in to the environment of how the animal is raised and because of this, it represents a very limited amount of livestock production today.

We recommend that the next tier would be products from animals that have not been exposed to any antibiotics, exogenous hormones or growth promotants from the time of birth to harvest. These two restrictions should be the minimum standards for this tier. Our consumer research shows that these are the biggest concerns of those that are looking for a “natural” product. We feel that rather than referring to the products in this tier as “naturally raised”, we should use a seal, similar to what is used for Organic, but containing the words “no antibiotics” and “no hormones”.

We further feel that this tier should have a third party certification similar to what is in place for Organic. We feel that it should be clear in the regulation that “no hormones” encompasses all levels of growth promotants, including feed additives (including but not limited to beta agonists). In short, any synthetic substance delivered to livestock, regardless of method of application, for the purposes of growth promotion will not be allowed in the production of animals in this tier.



The minimum standard for the third tier of products would be solely focused on those products that are minimally processed and use no artificial ingredients. These “natural” products would not be linked to production-based claims. However, if meat or poultry from the Organic or “No Antibiotics/No Hormones” product lines were to be further processed, then they must meet the requirements of “natural” products set in the third tier.

One of the fundamental points of our discussion is that we should NOT develop a classification system that uses the term “natural” in multiple applications. The proposal to have categories of “natural” products as well as “naturally raised” products is a proposal that creates far too much confusion in the minds of the consumer. We encourage AMS to continue to work closely with FSIS on proposed regulations that are being developed in both departments. We also encourage that these regulations be imposed at the same time to avoid confusion of the use of “natural” by both the consumer and by industry.

Thank you for your consideration of these comments.